



PROTECT | GROW | REDUCE TAXES

CUSTOMER PRIVACY POLICY

REGULATION S-P NOTICE

Kuhn Capital Partners, LLC

CRD #283028 | SEC File No. 801-132541

1415 W. 22nd Street Suite 530 Oak Brook, IL 60523
(331) 264-8822 | info@kuhnpc.com | www.kuhnpc.com

Effective Date: March 2026

Kuhn Capital Partners, LLC (“KCP”, “we,” “us,” or “our”) is committed to protecting the confidentiality and security of your nonpublic personal information. This Customer Privacy Policy is provided in accordance with Regulation S-P under the U.S. Securities and Exchange Commission and describes how we collect, use, and safeguard your information.

This policy applies to individuals who are clients or investors in separately managed accounts (“SMAs”) and private investment funds advised by us.

1. Overview

Kuhn Capital Partners, LLC is a registered investment adviser committed to maintaining the privacy and security of your personal financial information. We recognize that you have entrusted us with sensitive information and we take that responsibility seriously. This policy governs our handling of nonpublic personal information in compliance with Regulation S-P and all applicable federal and state privacy laws.

2. Information We Collect

We collect nonpublic personal information about you from the following sources:

A. Information You Provide

- Subscription agreements and investor questionnaires
- Advisory agreements and account opening documents
- Tax forms (e.g., IRS Forms W-9 or W-8)
- Communications (written, electronic, or oral)

B. Information from Transactions

- Account balances and positions
- Investment activity and transaction history
- Capital contributions and distributions
- Performance and valuation data

C. Information from Third Parties

- Custodians, administrators, brokers, and counterparties
- Service providers (e.g., fund administrators, auditors)
- Background checks or compliance databases (where applicable)

3. How We Use Your Information

We use your nonpublic personal information for legitimate business purposes, including:

- Providing investment advisory services
- Managing and administering accounts and private funds

- Processing transactions and maintaining records
- Performing compliance, risk management, and regulatory reporting
- Communicating with you regarding your account or investments
- Meeting legal and contractual obligations

4. Disclosure of Information

We do not sell your nonpublic personal information. We may disclose your information only as permitted by law, including the following circumstances:

A. Service Providers

We may share information with third parties that perform services on our behalf, such as:

- Fund administrators
- Custodians and prime brokers
- Auditors, tax advisors, and legal counsel
- Technology and data service providers

These parties are contractually required to maintain the confidentiality of your information and may only use it in connection with the services they perform on our behalf.

B. Regulatory and Legal Requirements

We may disclose information:

- To comply with applicable laws, rules, or regulations
- In response to subpoenas or legal process
- To regulatory authorities, including the SEC

C. Affiliates

We may share information with our affiliates for operational, compliance, or servicing purposes, consistent with applicable law.

D. With Your Consent

We may disclose your information as directed by you or with your express consent.

5. Confidentiality and Security

We maintain physical, electronic, and procedural safeguards designed to protect your nonpublic personal information, including:

- Restricted access to authorized personnel only
- Secure systems and data encryption where appropriate
- Vendor due diligence and oversight
- Policies governing data handling and confidentiality

We regularly review and update our security practices to address new and evolving threats to the security of personal information.

6. Former Clients

We maintain the same privacy protections for former clients as we do for current clients. Your information will continue to be safeguarded in accordance with this policy after your relationship with us has ended.

7. Opt-Out Rights

Because we do not share your nonpublic personal information with non-affiliated third parties for marketing purposes, there are generally no opt-out rights applicable under this policy. If our practices change in a manner that would require us to provide you with an opt-out opportunity, we will provide you with the required notice and opt-out rights as required by applicable law.

8. Changes to This Policy

We may update this Customer Privacy Policy from time to time to reflect changes in our practices or legal requirements. If we make material changes, we will provide you with an updated notice as required by applicable law. We encourage you to review this policy periodically.

9. Contact Information

If you have any questions or concerns about this Customer Privacy Policy or our privacy practices, please contact:

Robert Kuhn

Chief Compliance Officer
Kuhn Capital Partners, LLC
1415 West 22nd Street, Suite 530
Oak Brook, IL 60523
robert@kuhnpc.com

10. Additional Information for Private Fund Investors

Investors in private funds should be aware that their information may be shared with fund service providers, including administrators, auditors, and tax preparers, as necessary to operate the fund and comply with legal and regulatory requirements. Such disclosures are made in accordance with the fund's governing documents and applicable law, and all service providers are required to maintain the confidentiality of investor information.

This policy is intended to comply with Regulation S-P and other applicable privacy laws governing registered investment advisers. This notice is provided to all clients and investors of Kuhn Capital Partners, LLC.
